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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,
Plaintiff,
v.
CHRISTOPHER BAKER,
Defendant.

Criminal No. 23-CR-031-J

**UNOPPOSED MOTION TO EXTEND GOVERNMENT'S EXPERT DESIGNATION
DEADLINE**

The United States respectfully requests the Court grant an extension of the government's expert designation deadline in this case and in support states:

1. Prior to filing this motion, the United States conferred with Mark Hardee, counsel for Christopher Baker, and he represented he does not oppose the motion.
2. This Court entered a discovery order regulating discovery in this case on March 21, 2023. (ECF No. 34). It directed the United States to designate experts "no later than forty-two (42) days prior to trial," which resulted in an expert designation deadline of April 10, 2023. (*See id.*)
3. The United States anticipates designating a number of experts, including a toxicologist, who will testify at trial as to various issues which are key to the successful prosecution of this case. At this time, due to voluminous evidence including multiple video recordings,

the government's toxicologist has not had adequate time to review and provide a written report regarding his analysis and opinions in this case.

4. Within one to two business days of filing this motion, the Government and the Defendant will file a stipulated motion for a continuance of the trial in this matter and a request that the trial be declared complex due to the number of crime laboratory witnesses (from at least three separate crime laboratories) who must be designated as expert witnesses in addition to other expert witnesses, which include an emergency room doctor, a forensic pathologist, a coroner and possibly others, who must be noticed in this matter. Should the motion for continuance and declaration of the case as complex be granted, the United States would request the deadlines in the discovery order follow the new trial date, including the expert witness designation. Should the motion for continuance be denied, the United States would request a minimum of an additional two weeks in which to designate its experts in this matter.
5. Therefore, the government respectfully requests that the Court extend the government's expert designation for a period of at least two weeks to permit time to receive the report of the expert toxicologist and designate its necessary experts.

Respectfully submitted this 7th day of April 2023.

NICHOLAS VASSALLO
United States Attorney

By: /s/ Kerry J. Jacobson
KERRY J. JACOBSON
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of April, 2023, the foregoing was electronically filed and consequently served on defense counsel.

/s/ Mikala Dawson
For the United States Attorney's Office